

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

AMANDA JONES, *plaintiff*,

Case No. 2:24-cv-10750

vs.

DAN KLEINMAN, *defendant*.

COMPLAINT

Plaintiff Amanda Jones, through undersigned counsel, files this complaint against Defendant Dan Kleinman:

INTRODUCTION

1. Dan Kleinman is a self-described library watchdog in New Jersey. For years, he has harassed librarians, primarily, but not exclusively, online. He authors a blog called SafeLibraries where he reports purported librarian-related exposés. He promotes his material on X, where he posts using the handle @SexHarrassed.

2. Amanda Jones is an elementary school librarian in Louisiana. For the past two years, Kleinman has targeted Jones, sometimes posting about her several times in one day. He falsely represents that she “sexualizes” children. He claims she gives adult books with titles such as “Spanking for Lovers,” “The Ultimate Guide to Kink,” and “The Ultimate Guide to Threesomes” to children. He labels her a “child groomer” and “domestic terrorist.”

3. Kleinman specifically directs his posts about Jones to a Louisiana audience, including Louisiana’s elected officials. His activities directed at Jones have escalated in recent months. Since March, he has appeared on Louisiana talk radio to talk about Jones; traveled to Louisiana for the purpose of speaking about Jones at a ticketed event, for which he was the featured

guest; purported to have attended the annual Louisiana Library Association meeting for the purpose of encountering Jones; and even contacted Live Oak Middle School, Jones's employer, at least twice. He has implored the Louisiana Department of Education to revoke Jones's teaching certificate and Livingston Parish parents to challenge it.

4. Kleinman's statements about Jones are false and harmful. They cast Jones as a deviant and a danger to children and expose her to misplaced contempt and ridicule. There is perhaps no statement more injurious to an elementary educator than that they "sexualize" children.

5. "Our constitution has expressly balanced the right of free speech with the responsibility for abuse of that right." *Kennedy v. Sheriff of E. Baton Rouge*, 2005-1418 (La. 7/10/06), 935 So. 2d 669, 680. "[T]here is no constitutional value in false statements of fact. Neither the intentional lie nor the careless error materially advances society's interest in 'uninhibited, robust, and wide-open' debate on public issues." *Mashburn v. Collin*, 355 So. 2d 879, 884 (La. 1977) (quoting *Gertz v. Robert Welch, Inc.*, 418 U.S. 323, 340 (1974)). *See also Johnson v. Purpera*, 2020-01175 (La. 5/13/21), 320 So. 3d 374, 394 (same).

6. Kleinman's activities subject him to the jurisdiction of Louisiana courts. Nevertheless, out of an abundance of caution, Jones simultaneously files this lawsuit in the U.S. District Courts for the Middle District of Louisiana and New Jersey.

7. Jones files this lawsuit to hold Kleinman accountable for his false statements about her, but this lawsuit is not solely for Jones. Jones is not the only target of Kleinman's campaigns. Jones hopes that this lawsuit might cause Kleinman to stop falsely maligning librarians everywhere.

PARTIES

8. Plaintiff Amanda Jones is an adult resident of Livingston Parish, Louisiana.

9. On information and belief, Defendant Dan Kleinman is an adult resident of Chatham, New Jersey. He is an owner of SafeLibraries Inc., and available records indicate SafeLibraries Inc. was formed in the state of New Jersey in 2016 and suspended in 2018. Kleinman and SafeLibraries Inc. use the address 641 Shunpike Road # 123 Chatham, New Jersey 07928, which appears to be a mailbox at a UPS store in Chatham, New Jersey.

SUBJECT MATTER JURISDICTION

10. Federal district courts have subject matter jurisdiction over this case pursuant to 28 U.S.C. § 1332(a) because the parties are citizens of different states and the amount in controversy exceeds \$75,000.

VENUE

11. Venue is proper in both the U.S. District Courts for the Middle District of Louisiana and New Jersey pursuant to 28 U.S.C. § 1391(b)(2) because a substantial part of the events giving rise to this case occurred in those districts.

PERSONAL JURISDICTION

12. The U.S. District Court for the Middle District of Louisiana has personal jurisdiction over Kleinman because, as shown in this complaint, his purposeful contacts with the state of Louisiana give rise to Jones's claims. *See Ford Motor Co. v. Montana Eighth Jud. Dist. Ct.*, 592 U.S. 351, 359 (2021). Among other things:

13. He specifically directs his posts about Jones to a Louisiana audience, including Louisiana's elected officials, who he tags.

14. He has appeared on Louisiana talk radio to talk about Jones.

15. He has traveled to Louisiana to speak about Jones at a ticketed event in Baton Rouge, where he was the featured guest.

16. He purports to have attended the annual Louisiana Library Association meeting for the purpose of encountering Jones.

17. He contacted Live Oak Middle School, Jones's employer, at least twice. He made requests pursuant to the Louisiana Public Records Act for, among other things, records of Jones's job performance.

18. He has implored the Louisiana Department of Education to revoke Jones's teaching certificate and Livingston Parish parents to challenge it.

19. These purposeful contacts with the state of Louisiana notwithstanding, out of an abundance of caution, to preserve all rights, in addition to filing this lawsuit in the U.S. District Court for the Middle District of Louisiana, Jones also files it in the U.S. District Court for New Jersey.

FACTS

20. Kleinman has targeted Jones, sometimes posting about her several times in one day, for at least the past two years. He falsely represents that she "sexualizes" children by giving them "obscene" or otherwise sexually explicit material. He says Jones "preys on kids" and calls her a "child groomer."

21. Kleinman's false statements about Jones expose her to misplaced contempt and ridicule. The following are merely indicative of readers' responses to Kleinman's false statements:

“She wrote a whole book about defending porn
to be available to kids in libraries?”

“Right. There's one reason, and one reason only why adults would fight to
sexualize children. And all under the cloak of the 1st amendment.
Devious demons.”

“Because she is a big fat groomer liar, that's why. The lengths they are willing to
go to distribute obscenity to minor children is profoundly disturbing.”

“A national book tour to promote graphic porn for children. Sick!”

“Who is this sick pervert- AMANDA JONES???
hiding SEXUAL content from Parents..”

“Ah, Amanda Jones. She needs to be in prison for what she's doing to kids.”

“She's nobody's hero. She's a groomer. A rather sick and disgusting groomer.”

22. Kleinman's false statements are too numerous to reproduce here. The following false statements, all made in 2024 only, are indicative and serve as the basis of this complaint:

February 2024

23. From a February 4, 2024, X post, referring to “@abmack33,” who is Amanda Jones:
School librarians trains students to use @Grindr to meet men for a night.

24. From a February 7, 2024, X post, referring to “Amanda Jones @abmack33”:
Gr@mers help each other gr@m school children.

25. From a February 16, 2024, X post, referring to “Amanda Jones @abmack33”:

S3xualizing school kids is big business for one of @ALALibrary’s school librarian poster girls.

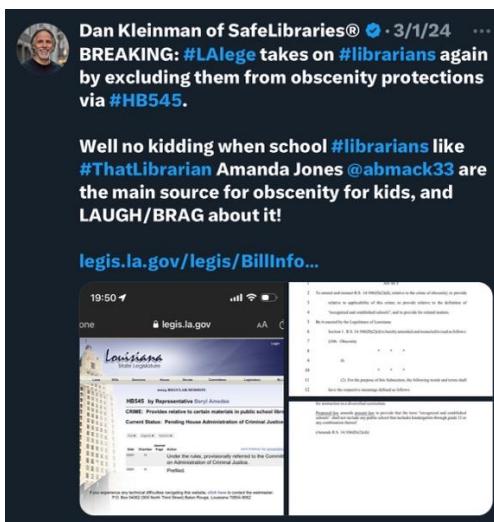
26. From a February 25, 2024, X post, referring to “Amanda Jones @abmack33”:

gro—mers will go into overdrive to convince you + legislators to let them keep s3xualizing kids

March 2024

27. From a March 1, 2024, X post:

school #librarians like #ThatLibrarian Amanda Jones @abmack33 are the main source of obscenity for kids



28. From a March 4, 2024, X post:

I've been called 'dangerous' for writing this. But Amanda Jones @abmack33 #ThatLibrarian isn't dangerous for s3xualizing and indoctrinating her middle school students

29. From a March 9, 2024, X post:

Hmm! I'm in Louisiana talking how #librarians collude to s3xualize and indoctrinate children! Sunday is the annual Louisiana Library Association meeting with #ThatLibrarian Amanda Jones @abmack33 so I'll see her! Us NJ guys really get around!



30. From a March 12, 2024, X post:

The word is gr—mer, in this case #ThatLibrarian Amanda Jones @abmack33, star of @ALALibrary's #UniteAgainstBookBans @UABookBans to s3xualize + indoctrinate children nationwide. Be certain this isn't defamation; I'm merely reporting what she herself said

31. From a March 29, 2024, X post:

Librarians s3xualize and indoctrinate school kids like #ThatLibrarian Amanda Jones @abmack33 does, then parents complain

April 2024

32. From an April 8, 2024, X post:

Actual gr—mer of children, Louisiana school #librarian Amanda Jones, rarely opens her @abmack33 account, but it's open now + she's slamming #lalege #lagov essentially for protecting citizens from gr—mers like her. And her gr—ming is truth, not defamation

33. From an April 9, 2024, X post:

Amanda Jones @abmack33 in Louisiana preys on kids. Middle school #librarian. This is what could happen. #ThatLibrarian. And she's @ALALibrary's #UniteAgainstBookBans model. She's gr—ming kids (fact, not defamation, she says it). What could go wrong?

34. From an April 10, 2024, X post:

I report things. People who I expose call that harassment. Amanda Jones @abmack33 is a gr—mer, e.g. I reported her admitting that, but #librarians hate my reporting that. That's their problem, not mine. Here's my report of her admitting to gr—ming

35. From an April 11, 2024, X post:

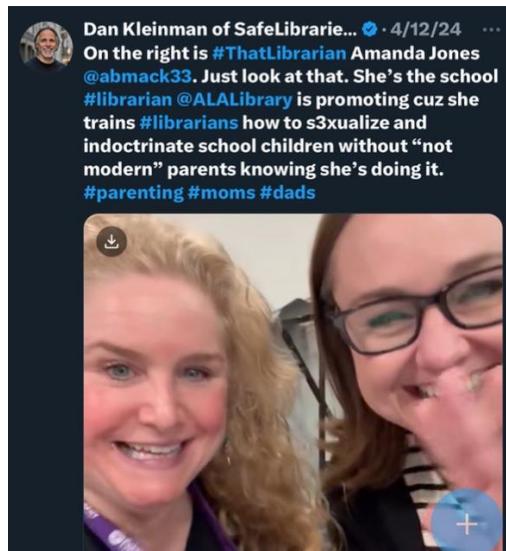
@ALALibrary promoting nation's leading child gr—mer school librarian Amanda Jones @abmack33.

36. From an April 11, 2024, X post:

Louisiana's middle school librarian child gr—mer (fact via her own admissions, not defamation) Amanda Jones has opened her @abmack33 X to attach/astroturf #lalege further for trying to stop her from further s3xualizing, indoctrinating school kids

37. From an April 12, 2024, X post, posting a photo of Amanda Jones:

On the right is #ThatLibrarian Amanda Jones @abmack33. Just look at that. She's the school #librarian @ALALibrary is promoting cuz she trains #librarians how to s3xualize and indoctrinate school children without 'not modern' parents knowing she's doing it.



38. From an April 21, 2024, X post, referring to "Amanda Jones @abmack33":

Here's a middle school child gr—mer school librarian mooching money with her #ThatLibrarian book on how to sneak things past 'not modern' parents she knows they don't want: s3xualization and Marxism.

39. From an April 26, 2024, X post:

@LOMiddleLibrary has DELETED its account after I wrote to the principal to unblock @SexHarrassed. The account was run by #ThatLibrarian Amanda Jones @abmack33, a school #librarian who I reported on admitting to gr**ming school children.

May 2024

40. From a May 1, 2024, X post:

What happened? One of the nation's leading school librarian child gr—omers Amanda Jones @abmack33 is happy #HB946 & #HB777 are 'killed.' What happened? Gr—mers trump children in LA?

41. From a May 4, 2024, SafeLibraries blog post:

My own conclusion from Amanda's actions and reactions as I have reported indicates to me that she needs to be fired as soon as possible—for the kids sake, the end of this school year might be best. And any action taken by Louisiana legislators in reaction to what I and New Louisiana has already disclosed and continue to disclose is done in an atmosphere where school librarians are hiding things from parents AND repeatedly deleting things being reported about their responses to my investigative efforts. When her book 'That Librarian' finally gets published in August, I'll be reading it closely because I'm certain she'll have even more things to hide after I report on that book. Only this time it will have been published on paper and it will be too late to sneak changes behind the scenes in violation of Louisiana law.

42. From a May 11, 2024, X post, referring to "@abmack33," resharing a photo and joke suggestive of anal sex, and referring to a book that allegedly depicts anal sex:

The favorite subwoofer of school librarians .. who like to give kids books like 'Let's Talk About It'!



43. From a May 15, 2024, X post:

What are the consequences of the school deleting its @X account? I know the middle school library where #ThatLibrarians Amanda Jones @abmack33, the self admitted gr***mer, has deleted a school account too: @LOMiddleLibrary.

44. From a May 23, 2024, X post:

Do what's right by citizens and the law. Don't be swayed by tauntings of #librarian Amanda Jones @abmack33 who admits to gr***ming kids of 'not modern' parents @LOMEagles.

45. From a May 24, 2024, X post:

Self admitted child gr***mer and school librarian Amanda Jones @abmack33 who wrote #ThatLibrarian is announcing she is going to continue gr***ming school children.

46. From a May 30, 2024, X post:

No thanks, says Louisiana's home grown gr***mer Amanda Jones @abmack33 #ThatLibrarian to @cadebrumley. When is someone going to fire her from @LOMEagers?

July 2024

47. From a July 14, 2024, X post:

I guarantee you Amanda Jones' @abmack33 parents did NOT raise her to be a child gr***mer.

48. From a July 15, 2024, X post:

We are all supposed to believe this self-admitted child gr***mer Amanda Jones @abmack33 is a hero cuz she's pretty and a school #librarian, not a creepy old man. Like that makes gr***ming okay. She wrote a book!

49. From a July 16, 2024, X post:

Do you realize #ThatLibrarian Amanda Jones @abmack33 is so popular among #librarians BECAUSE she bragged how she s*xualizes and indoctrinates school kids without 'not modern' parents knowing?

50. From a July 26, 2024, X post:

School library self-admitted child gr**mer Amanda Jones @abmack33 provides an update ...

51. From a July 28, 2024, X post:

How has school librarian Amanda Jones s*xualized kids?

August 2024

52. From an August 2, 2024, X post:

By the way, #ThatLibrarian Amanda Jones @abmack33 bragged about s*xualizing and indoctrinating school kids without 'not modern' parents knowing. No wonder ALA is attacking Christian families to support her and @BloomsburyPub is publishing her lies

53. From an August 3, 2024, X post, resharing a Newsweek article titled “Surgical Castration for Child Sex Offenders Takes Effect in Louisiana”:

FYI Amanda Jones @abmack33 #ThatLibrarian

Dan Kleinman of SafeLibraries@ · 8/3/24 · ...
FYI Amanda Jones @abmack33 #ThatLibrarian

#UniteAgainstBookBans #tlchat #ialege

Gays Against Groomers @a... · 8/2/24
BREAKING: Louisiana has become the first state with the power to punish child sex offenders with surgical castration.

This is incredible news and should be the law of the land in all 50 states!

Make Pedophiles Afraid Again.
#GaysAgainstGroomers

Newsweek SUBSCRIBE FOR \$1 Login

News Louisiana Children Sex Offi

Surgical Castration for Child Sex Offenders Takes Effect in Louisiana

Published Aug 02, 2024 at 10:02 AM EDT

54. From an August 6, 2024, X post:

child gr**mer middle school #librarian Amanda Jones @abmack33 wrote a book called #ThatLibrarian that urges #librarians how to further s*xualize and indoctrinate more school children

55. From an August 8, 2024, X post:

What thought process allows school #librarians, like Amanda Jones @abmack33 #ThatLibrarian + Martha Hickson @sassy_librarian, to s*xualize + indoctrinate school children?

56. From an August 14, 2024, X post:

Gr**mer gone. Bye Martha Hickson @sassy_librarian. Book by #ThatLibrarian Amanda Jones @abmack33, also a gr**mer, has a section about Martha who has no retired and I heard may have been told she would be fired. So fake news incoming.

57. From an August 25, 2024, X post:

Child gr—mer Amanda Jones @abmack33 goes on a book tour. She wrote #ThatLibrarian for @ALALibrary's #UniteAgainstBookBans to s—xualize and indoctrinate as many kids as possible ... Go meet a gr—mer.

58. From an August 27, 2024, X post, directed to “abmack33”:

You're promoting a gr—mer book on gr—ming.

59. From an August 27, 2024, X post, directed to “abmack33”:

You like gr—ming?

60. From an August 27, 2024, X post, directed to “abmack33”:

She's a gr—mer.

61. From an August 27, 2024, X post, directed to “abmack33”:

She's lying and she's a gr—mer.

62. From an August 27, 2024, X post, referring to “Amanda Jones”:

NO ONE SHOULD ATTACK SCHOOL LIBRARIANS. That said, this particular one is a self-admitted gr—mer. Her certification should be revoked.

63. From an August 31, 2024, SafeLibraries blog post:

Now I bring new evidence about Amanda and it is not only shocking, but it infects her public school's administration. Administrators at Live Oak Middle School, Denham Springs, LA, are colluding with Amanda to violate state law pertaining to open public records.

September 2024

64. From a September 1, 2024, X post:

Amanda Jones—That Librarian—School Librarian Who Packs Heat—To Kill Parents Who Don't Like Her Gr—ming Their Kid

65. From a September 2, 2024, X post, resharing article about “subsonic ammo”:

Now that school librarian Amanda Jones @abmack33 who wrote That Librarian is carrying a gun to defend against parents who oppose her s*xualizing and indoctrinating their kids, maybe she would be interested in this



66. From a September 3, 2024, X post:

Administrators at Live Oak Middle School, Denham Springs, LA, are colluding with Amanda to violate state law pertaining to open public records.

67. From a September 7, 2024, email to Live Oak Middle School’s principal, “Regarding Amanda Jones”:

It is apparent to me that you are acting in violation of the law to protect a school librarian who has publicly stated that she is s*xualizing and indoctrinating school children in her library. Now that makes you responsible as well for covering up her acts.

The audacity of you people. You have Louisiana's most prominent school librarian, now the nation's most prominent school librarian given the push she has gotten from American Library Association, who admitted publicly to gr***ming middle school children. ... You are now accessories after the fact. I am going to do my best to make sure every Louisiana legislator and relevant court knows this.

So here's the deal: You respond in accordance with Louisiana law instead of the Amanda Jones Protection Act of Live Oak Middle School Administrators, and you provide each and every document requested, then the public won't think you have joined Amanda Jones in violating the law to keep the 'not modern' parents in the dark while their children are s*xualized and indoctrinated by school librarians like Amanda Jones and those she trains.

68. From a September 8, 2024, SafeLibraries blog post:

And to Livingston Parish parents, I'm doing my best to expose the harm Amanda Jones and now Live Oak Middle School is doing to your children. I even appeared in Baton Rouge to speak for Citizens for a New Louisiana. . . . But I'm not there now. You need to stand up and demand your school serve you and not some Chicago, Illinois, organization empowering Amanda Jones . . . to indoctrinate and s*xualize your children.

One thing to consider could be challenging the teaching certificate of Amanda Jones. . . . 'Educator credentials can be sanctioned for a conviction of certain criminal offenses, for the submission of fraudulent documentation, for professional license censure, for failure to meet the standards for effectiveness, or for participation in cheating' . . . Anyone see anything there or in the remaining sections? I do.

She's also the poster girl for blowing past Louisiana laws, ethics, and educational standards. If her actions don't lead to change, no one's will, and it's open season on the children.

Why is public employee Amanda Jones still employed in your school? Why are school administrators allowed to help her target your children? How much more evidence is needed before you act?

69. From a September 16, 2024, X post:

PARENTS: School #librarian gr mers like @abmack33 @sassy_librarian are featured in this #BannedBooksWeek PW pub that gaslights from stem to stern

October 2024

70. From an October X, 2024, X post:

As to Amanda Jones, she admits to gr***ing students and is on a nationwide tour for @ALALibrary #UniteAgainstBookBans to train other librarians how to gr***m more students.

November 2024

71. From a November 5, 2024, X post, posting a photo of Amanda Jones:

What does a school #librarian child gr***mer look like?



72. From a November 9, 2024, X post, posting photos of books with visible titles “Spanking for Lovers,” “The Ultimate Guide to Kink,” “The Ultimate Guide to Threesomes,” and “A Transracial Adoption Story”:

Do these look like the perfect school books school librarians like Amanda Jones @abmack33 and Martha Hickson @sassy_librarian would love to give school children per @ALALibrary’s #UniteAgainstBookBans? Yes, they already cover these topics.



CAUSES OF ACTION

COUNT ONE: DEFAMATION

73. Jones realleges the foregoing facts as if stated fully.

74. A defamation claim has the following elements: (1) defamatory words, (2) publication, (3) falsity, (4) malice, and (5) resulting injury.

Defamatory words

75. Kleinman falsely states that Jones gives highly age-inappropriate sexual material, including books that depict anal sex and books with titles such as “Spanking for Lovers,” “The Ultimate Guide to Kink,” and “The Ultimate Guide to Threesomes,” to children.

76. He falsely states that she “preys on kids.”

77. He falsely states that she “sexualizes” children.

78. He falsely labels her a “child groomer.”

79. Kleinman’s statements are defamatory *per se* or, at minimum, capable of defamatory meaning, because they accuse Jones of criminal conduct and by their very nature injure Jones’s personal or professional reputation.

80. Under La. R.S. § 14:81, “Indecent Behavior with Juveniles,” it is a crime to share “textual, visual, written, or oral communication[s] depicting lewd or lascivious conduct, text, words, or images” with persons under 17.

81. The representations that an elementary educator “preys on” and “sexualizes” children necessarily injures their personal and professional reputation.

82. There is no label more injurious to an elementary educator than “child groomer.” “Groomer” is understood to mean one who cultivates a sexual relationship with a child. *See, e.g., Feitosa v. Keem*, No. 22-cv-3775, 2023 WL 2267055 n.2 (W.D.N.W. Feb. 23, 2023) (denying motion to dismiss defamation claim arising from tweet which alleged plaintiff was a groomer: “In common parlance, ‘grooming’ is understood to be ‘a tactic where someone methodically builds a trusting relationship with a child or young adult, their family, and community to manipulate, coerce, or force the child or young adult to engage in sexual activities.’”); *Bain v. Wrend*, No. 5:14-cv-00202, 2016 WL 4064030 n.2 (D. Vt. July 28, 2016) (“‘Grooming’ is a ‘term commonly used to mean cultivation of an inappropriate relationship with a child for a sexual purpose.’”).

Publication

83. Kleinman made, i.e., published, his statements in the X posts and blog posts reproduced in this complaint.

84. On information and belief, he made the same statements in presentations he made specifically about Jones to targeted audiences on the radio and in-person in Louisiana.

Falsity

85. Kleinman's statements are false.

86. Jones does not give highly age-inappropriate sexual material, including books that depict anal sex and books with titles such as "Spanking for Lovers," "The Ultimate Guide to Kink," and "The Ultimate Guide to Threesomes," to children.

87. She does not "prey on" or "sexualize" children.

88. She is not a "child groomer."

89. Kleinman represents his statements to be statements of fact, not statements of opinion.

90. Even if he holds them as personal opinions, it remains that they are provably false.

Actual malice

91. Kleinman makes his statements about Jones with actual malice:

92. He knows his statements are false.

93. At a very minimum, he recklessly disregards whether they are false.

94. The notion that an elementary educator such as Jones would "prey on," "sexualize," and "groom" children, including by giving them highly age-inappropriate sexual material, is so inherently improbable that Kleinman must be malicious and at minimum reckless in posting it.

Injury

95. Kleinman's statements are injurious:

96. The representations that an elementary educator "preys on" and "sexualizes" children, including by giving them highly age-inappropriate sexual material, necessarily injures their personal and professional reputation.

97. There is no label more injurious to an elementary educator than "child groomer."

98. Kleinman's statements expose Jones to misplaced contempt and ridicule. He is liable for any damages caused by his defamation of Jones.

COUNT TWO: FALSE LIGHT

99. Jones realleges the foregoing facts as if stated fully here.

100. "A cause of action for 'false light' invasion of privacy arises from publicity which unreasonably places the plaintiff in a false light before the public. The publicity need not be defamatory in nature, but must be objectionable to a reasonable person under the circumstances and must contain either falsity or fiction." *Brunner v. Holloway*, 2017-0674 (La. App. 1 Cir. 11/2/17), 235 So. 3d 1153, 1161 (citation omitted).

101. Kleinman's statements unreasonably place Jones in a false light before the public. They are objectionable and false.

102. Kleinman is liable for any damages caused by his casting Jones in a false light.

DEMAND FOR JURY TRIAL

103. Jones respectfully demands a trial by jury.

PRAYER FOR RELIEF

104. Jones respectfully asks that, after due proceedings, the Court enter judgment against Kleinman awarding Jones compensatory damages in excess of \$75,000 in an amount to be proven at trial, plus interest, and any other relief to which she is entitled.

Respectfully submitted,

/s/ Kaja S. Elmer

Kaja S. Elmer, N.J. Bar No. 077982013
Fishman Haygood LLP
201 St. Charles Avenue, Suite 4600
New Orleans, Louisiana 70170
t: 504-586-5252
kelmer@fishmanhaygood.com

Alysson Mills, *application for admission pro hac vice forthcoming*
650 Poydras Street, Suite 1525
New Orleans, Louisiana 70130
t/f: 504-586-5253
alysson@alyssonomills.com

for Amanda Jones